

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VORTEX PATHWAY LLC, a Texas limited liability corporation,

*Plaintiff,*

V.

HID GLOBAL CORPORATION, a  
Delaware corporation,

*Defendant.*

Civil Action No. 2:16-cv-00954-JRG-RSP

## Jury Trial Demanded

## **JOINT MOTION TO STAY ALL DEADLINES**

Plaintiff Vortex Pathway LLC and Defendant HID Global Corporation file this Joint Motion to Stay All Deadlines Pending Final Settlement, and respectfully show the Court as follows:

Plaintiff and Defendant have reached a settlement in principle that resolves all claims asserted between them. Both parties expect to work cooperatively to finalize an agreement that memorializes the terms of their agreement and to jointly seek a dismissal of all claims asserted between them within the next thirty (30) days.

In light of the above representations, Plaintiff and Defendant respectfully request a thirty-day stay of all deadlines as of the filing of this Joint Motion or until December 22, 2016, and request that all pending deadlines be extended accordingly, including Defendant's November 22, 2016 deadline for responding to the Complaint. A proposed order is attached.

Dated: November 22, 2016

**FISH & RICHARDSON P.C.**

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**ATTORNEYS FOR DEFENDANT HID  
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Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF  
VORTEX PATHWAY LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on November 22, 2016, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who have consented to electronic service, Local Rule CV-5(a)(3)(A).

/s/ *Kenneth P. Kula*

Kenneth P. Kula